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EDWARD BENNETT WILLIAMS (1920-1988)
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April 25, 2024

Via ECF

The Honorable Valerie Figueredo
United States Magistrate Judge
for the Southern District of New York
500 Pearl Street
New York, NY 10007

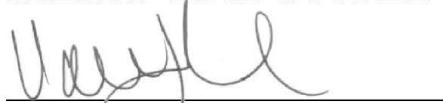
Re: *United States ex rel. Bassan v. Omnicare, Inc.*, No. 15-cv-04179 (CM) (VF)

Dear Judge Figueredo:

Under Rule I.g of Your Honor's Individual Practices and the Protective Order in this matter (ECF 102), we write on behalf of Defendants to request the Court seal the exhibits to their letter responding to the government's motion to compel (ECF 449). The exhibits should remain under seal because they contain commercially-sensitive and proprietary information, as defined in ¶ 4 of the Protective Order, and for that reason have been designated as "confidential." Sealing is appropriate for that reason, particularly where, as here, any presumption of public access is "not particularly great" because they were submitted in connection with a discovery motion. *Alexander Interactive, Inc. v. Adorama, Inc.*, 2014 WL 4346174, at 2 (S.D.N.Y. Sept. 2, 2014). The Court previously ordered similar exhibits to discovery motions sealed for these reasons. *See, e.g.*, ECF 457.

We appreciate the Court's consideration.

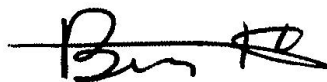
MEMO ENDORSED



HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE
DATED: April 26, 2024

The motion to seal requested herein is granted. The Clerk of Court is directed to maintain the viewing restrictions on ECF No. 465. The Clerk of Court is respectfully directed to terminate the Motion at ECF No. 464.

Respectfully submitted,



Benjamin Hazelwood